

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

**IN RE JOHNSON & JOHNSON  
TALCUM POWDER PRODUCTS  
MARKETING, SALES PRACTICES,  
AND PRODUCTS LIABILITY  
LITIGATION**

**MDL NO. 16-2738 (FLW) (LHG)**

**PLAINTIFFS' MOTION TO REDACT PLAINTIFFS'  
MEMORANDUM OF LAW IN OPPOSITION TO PERSONAL  
CARE PRODUCTS COUNCIL'S MOTION TO DISMISS  
AND SEAL CERTAIN ACCOMPANYING EXHIBITS**

Pursuant to Rule 5(d) of the Federal Rules of Civil Procedure and Local Civil Rules 5.3(c) and 7.1, Plaintiffs, as identified in Exhibit A to Defendant Personal Care Products Council's Memorandum of Law in Support of Its Motion to Dismiss (Dkt. No. 256-2), by and through Plaintiffs' Steering Committee, hereby move to file Exhibits C, F and H to Plaintiffs' Memorandum of Law in Opposition to Personal Care Products Council's Motion to Dismiss under seal, and to redact those portions of the Memorandum referring to the sealed Exhibits.

The documents at issue have previously been produced by Defendant Personal Care Products Council in a separate litigation and designated as "Protected Document – Subject to Protective Order." By agreement, the documents have been made available to Plaintiffs in the above-captioned litigation, but remain subject to a protective order.

A proposed form of Order has been simultaneously submitted.

Respectfully Submitted,

Dated: June 19, 2017

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